

EXHIBIT 1

A. Plaintiffs respectfully request that the following facts be established for purposes of this action:

1. Defendant Vanguard America entered into an agreement with one or more co-conspirators to plan the Unite the Right event that took place in Charlottesville, Virginia on August 11 and 12, 2017.
2. Defendant Vanguard America entered into an agreement with one or more co-conspirators to engage in racially motivated violence in Charlottesville, Virginia on August 11, 2017.
3. Defendant Vanguard America entered into an agreement with one or more co-conspirators to engage in racially motivated violence at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.
4. Defendant Vanguard America was motivated by animus against racial minorities, Jewish people, and their supporters when conspiring to engage in acts of intimidation and violence on August 11 and 12, 2017 in Charlottesville, Virginia.
5. It was reasonably foreseeable to and intended by Defendant Vanguard America that its co-conspirators would commit acts of racially-motivated violence and intimidation at the torch light event in Charlottesville, Virginia on August 11, 2017.
6. It was reasonably foreseeable to and intended by Defendant Vanguard America that its co-conspirators would commit acts of racially-motivated violence and intimidation at the Unite the Right event in Charlottesville, Virginia on August 12, 2017.

7. It was reasonably foreseeable to and intended by Defendant Vanguard America that its co-conspirator would engage in racially-motivated violence by intentionally driving a car into a crowd of counter-protestors on August 12, 2017.
8. Defendant Vanguard America committed multiple overt acts in furtherance of the conspiracy it entered into to commit racially-motivated violence at the Unite the Right event in Charlottesville.
9. Defendant Vanguard America attended the torch light march on August 11, 2017 and committed acts of intimidation and violence in furtherance of the conspiracy.
10. Defendant Vanguard America attended the Unite the Right event on August 12, 2017 and committed acts of intimidation and violence in furtherance of the conspiracy.
11. After the Unite the Right event in Charlottesville, Virginia on August 11 and 12, 2017, Defendant Vanguard America ratified the racially-motivated violence that occurred at the event.

B. Plaintiffs respectfully request that all documents Plaintiffs have a good faith basis to believe were in fact created by Defendant Vanguard America be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rules of Evidence. In particular, Plaintiffs have a good faith basis to believe that the following social media accounts, identified by the platform name, followed by the handle (or username), belong to Defendant Vanguard America. Plaintiffs reserve the right to amend this list if Plaintiffs identify accounts of additional individuals whose statements can fairly be offered against Vanguard America as a statement of Vanguard America pursuant to Federal Rule of Evidence 801(2).

Plaintiffs respectfully request that all documents from the following social media accounts be deemed “authentic” for purposes of satisfying Rule 901 of the Federal Rule of Evidence:

1. Discord – Dillon1488
2. Discord – White-PowerStroke
3. Discord – WhitePower_Stroke (Discord ID: 375095101719838723)
4. Discord – White-PowerStroke(Dillon) (Discord ID: 200103874801958912)
5. Discord – White_PowerStroke(Dillon) (Discord ID: 329868457824878593)
6. Discord – Thomas Ryan (Discord ID: 255039575758602240)
7. Discord – Thomas Ryan (Discord ID: 363070228864696330)
8. Discord – Commander#770
9. Email – Dillon_hopper@protonmail.com
10. Email – Tutanota
11. Facebook – vanguard.america
12. Gab – WomenofVanguard
13. Twitter - @VanAmOfficial
14. Twitter - @VanguardAm